

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOVAN VAVIC,

Defendant.

CRIMINAL NO.: 19-CR-10081-IT-MPK

MOTION TO ALLOW FOR REMOTE PROCEEDINGS

Defendant Jovan Vavic, by and through his counsel of record, respectfully requests that this Court allow for remote proceedings for the Hearing on the Motions *in Limine* scheduled for October 29, 2021 at 2:30 p.m.

On October 13, this Court scheduled a remote Interim Pretrial Conference for Coach Vavic for October 28, 2021, the day before the hearing on the Motions *in Limine*. Today, the Court granted Dr. Heinel's assented to motion for remote proceedings for the October 29 hearing on the Motions *in Limine*.

Since Coach Vavic and his counsel are located in California, Vavic likewise respectfully requests that this Court allow his appearance on October 29 to be conducted remotely.

The government takes no position on the requested relief.

Dated: October 26, 2021

Respectfully submitted,

/s/ Stephen G. Larson

Stephen G. Larson, (CA State Bar No. 145225)

slarson@larsonllp.com

(Admitted *pro hac vice*)

Koren L. Bell, (CA State Bar No. 268614)

kbell@larsonllp.com

(Admitted *pro hac vice*)

Paul A. Rigali, (CA State Bar No. 262948)

prigali@larsonllp.com

(Admitted *pro hac vice*)

LARSON LLP

555 South Flower Street, Suite 4400

Los Angeles, California 90071

(213) 436-4888

Irwin B. Schwartz (BBO# 548763)

ischwartz@blaschwartz.com

Nicholas R. Cassie (BBO# 672698)

ncassie@blaschwartz.com

BLA Schwartz, PC

One University Ave., Suite 302B

Westwood, Massachusetts 02090

Phone: 781-636-5000 - Fax: 781-636-5090

Attorneys for Defendant JOVAN VAVIC

COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

Undersigned counsel conferred with counsel for the government and the government, by and through AUSA Kriss Basil, takes no position on the requested relief.

/s/ Stephen G. Larson

Stephen G. Larson

Counsel for Defendant Jovan Vavic

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-participants on October 26, 2021.

/s/ Stephen G. Larson

Stephen G. Larson

Counsel for Defendant Jovan Vavic